

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STELLA CARBAJAL,

Plaintiff,

v.

NATIONS RECOVERY CENTER, INC.,

Defendant.

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No. CV-03-5988-RJD-RML

JURY DEMANDED

FILED

IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

AUG - 6 2004



★ BROOKLYN OFFICE ★

NOTICE OF FILING

To: See Certificate of Service

PLEASE TAKE NOTICE that on August 5, 2004, undersigned counsel filed the attached *Plaintiff's Acceptance and Filing of Rule 68 Offer of Judgment*, a copy of which is attached hereto and hereby served upon you.

Respectfully Submitted,

By: 
One of Plaintiff's Attorneys

Lance A. Raphael
Stacy M. Bardo
Allison Krumhorn
The Consumer Advocacy Center, P.C.
180 West Washington, Suite 700
Chicago, IL 60602
(312) 782-5808

Brian L. Bromberg
Brian L. Bromberg, P.C.
40 Exchange Place, Suite 2010
New York, NY 10005
(212) 248-7906

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STELLA CARBAJAL,

Plaintiff,

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JURY DEMANDED

**PLAINTIFF'S ACCEPTANCE AND FILING OF RULE 68
OFFER OF JUDGMENT**

Plaintiff, Stella Carbajal, by and through her attorneys, hereby accepts Defendant's, Nations Recovery Center, Inc.'s July 26, 2004 Rule 68 Offer of Judgment in the amount of \$30,000.00 inclusive of court costs and attorneys fees.

Plaintiff requests that under Rule 68, the Clerk of the Court enter judgment as set forth above, thereby concluding of all pending matters before the Court.

Dated: Chicago, Illinois
August 5, 2004

Respectfully Submitted,

By


Lance A. Raphael

Attorneys for Plaintiff

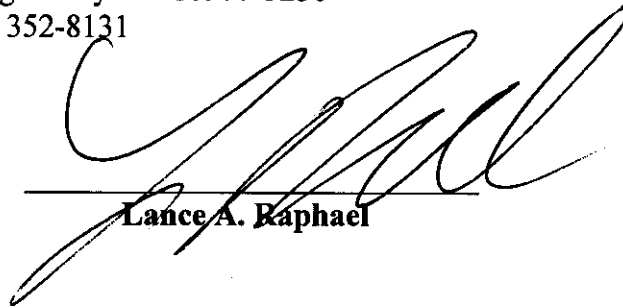
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Lance A. Raphael
Stacy M. Bardo
180 West Washington, Suite 700
Chicago, IL 60602
(312) 782-5808

CERTIFICATE OF SERVICE

I, Lance A. Raphael, an attorney, hereby certify that I caused to be served on the following counsel(s) of record the attached Plaintiff's ***Acceptance and Notice of Filing of the Acceptance of the Offer of Judgment*** on August 5, 2004, by Facsimile, Regular First Class Mail and Certified Mail to:

Arthur Sanders
2 Perlman Dr, Suite 301
Spring Valley NY 10977-5230
(845) 352-8131



Lance A. Raphael

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X
STELLA CARBAJAL,

Plaintiff,

- against -

NATIONS RECOVERY CENTER, INC.

Defendant.
-----X

03-CV-5988

OFFER OF JUDGMENT

Judge Dearie


To: **Brian L. Bromberg, P.C.**
40 Exchange Place – Suite 2010
New York NY 10005

Lance A. Raphael, Esq.
180 West Washington Street – Suite 700
Chicago IL 60602

OFFER OF JUDGMENT

Defendant, **NATIONS RECOVERY CENTER, INC.**, in the above entitled action, offers to allow judgment to be taken against it by plaintiff for \$30,000.00 inclusive of court costs and attorney fees accrued to date. This offer is made pursuant to Rule 68 of the Federal Rules of Civil Procedure and evidence of this offer is not admissible except in a proceeding to determine costs. If this offer is not accepted in writing within ten (10) days after it is served, it shall be deemed withdrawn.

Dated: **Spring Valley, New York**
July 26, 2004



ARTHUR SANDERS, ESQ. (AS1210)
Attorney for defendant
Nations Recovery Center, Inc.
2 Perlman Drive – Suite 301
Spring Valley NY 10977-5230
845-352-7272